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Cc: Hardcastle, Calvin[Calvin.Hardcastle@amec.com]
From: Conlan, Linda
Sent: Mon 1/6/2014 2:32:39 PM
Subject: Pechiney - Soil Removal Area 5a/5b/5c
Pechiney Soil Removal Area 5a 5b 5c.pdf

Hi Carmen,

Thank you for taking the time to talk with us about the Pechiney site. We are transmitting this information as a follow-up to our discussion regarding an area where PCB-impacted soil was encountered at a depth deeper than anticipated. The area in reference is shown on the attached figure and corresponds to soil removal areas 5a/5b/5c identified in our Application and the 2012 RAP.

In this area, the concrete slab is about 4 feet above native site grade. The base of the deeper portion of the soil removal area (shown in blue on the attached figure) is currently at about 19 to 25 feet below the slab (or about 15 to 21 feet below native grade). In the southern portion of the deeper excavation, we are proposing to leave soil in place with PCBs at concentrations less than 500 mg/kg at a depth of 15 feet below native grade and this proposal is similar to the site conditions as specified in the Conditional Approval (refer to Section C.3.b.6) for the 4a/4b soil removal area. Consistent with our application and the Conditional Approval, soil with PCBs that will be left in place below a depth of 15 feet below native grade will be covered with a physical barrier consisting of a minimum of 6 inches of concrete. For this area, we may use a cement-slurry in lieu of the concrete based on worker safety conditions which do not allow direct placement of concrete and pumping of cement-slurry may be required to place the cover. Based on the depth and location of the soil that will remain in place and the physical barrier, we do not anticipate disturbance of the material during future site grading.

For deeper portion of the excavation, additional soil will be removed on January 7, 2014, and additional verification samples will be collected from the base and side walls of the soil removal area as described in Section 2.3 [Soil Verification Sampling (PCBs)] in the July 2010 Concrete and Soil sampling and Analysis Plan (SAP). Based on the results of the verification samples, the area of the excavation where PCBs in soil may be left in place at a depth of 15 feet below native grade will be covered with a minimum of 6 inches cement slurry or concrete, which will be overlain with an orange mesh geotextile layer. The base of the excavation and concrete layer will be surveyed to document the depth and location of this feature. The remainder of the excavation will be backfilled with crushed concrete (defined as unrestricted site fill material). We anticipate starting the backfill process on Monday January 16, 2014.

I'll call you today to discuss further.

Thank you,
Linda

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